

1 BARRY J. PORTMAN  
Federal Public Defender  
2 ANGELA M. HANSEN  
Assistant Federal Public Defender  
3 160 West Santa Clara Street, Suite 575  
San Jose, CA 95113  
4 Telephone: (408) 291-7753  
5 Counsel for Defendant KASEY

6  
7  
8 IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

9 SAN JOSE DIVISION \*E-FILED - 4/13/06\*

10 UNITED STATES OF AMERICA, ) No. CR 06-00039 RMW  
11 )  
Plaintiff, )  
12 )  
v. ) **STIPULATION AND**  
13 ) **ORDER TO CONTINUE STATUS DATE**  
JAMES CORNELIUS KASEY, )  
14 )  
Defendant. )  
15 \_\_\_\_\_)

16  
17 Assistant United States Attorney Susan Knight and defendant, James Kasey, through his  
18 counsel, Assistant Federal Public Defender Angela M. Hansen, stipulate and agree that the status  
19 date in the above-captioned matter, presently scheduled for Monday, April 3, 2006, should be  
continued to Monday, May 15, 2006, at 9:00 a.m.

20  
21 The parties stipulate and agree that this status date should be continued because counsel  
22 for the government informed Mr. Kasey's counsel that it will not have the discovery to the  
23 defense until the end of this week. Once received, counsel will need time to review the discovery  
24 and to discuss it with her client. For these reasons, the parties agree to continue the status date to  
May 15, 2006.

25  
26 The parties further stipulate and agree that under 18 U.S.C §§ 3161(h)(8)(A) and (B)(iv),  
the ends of justice served by the continuance requested outweigh the best interest of the  
defendant and public in a speedy trial because the failure to grant such a continuance would

1 unreasonably deny Mr. Kasey the time necessary for effective preparation, taking into account  
2 the exercise of due diligence.

3  
4 Dated: March 30, 2006

/s/  
\_\_\_\_\_  
ANGELA M. HANSEN  
Assistant Federal Public Defender

5  
6  
7 Dated: March 30, 2006

/s/  
\_\_\_\_\_  
SUSAN KNIGHT  
Assistant United States Attorney

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

UNITED STATES OF AMERICA,	)	No. CR 06-00039 RMW
	)	
Plaintiff,	)	<b>ORDER CONTINUING</b>
	)	<b>STATUS DATE AND EXCLUDING</b>
v.	)	<b>TIME</b>
	)	
JAMES CORNELIUS KASEY,	)	
	)	
Defendant.	)	
_____	)	

The parties have jointly requested to continue the status date set for April 3, 2006 to May 15, 2006 at 9:00 a.m., GOOD CAUSE APPEARING, IT IS HEREBY ORDERED that the status date presently set for April 3, 2006 is continued to Monday, May 15, 2006, at 9:00 a.m. Pursuant to the parties' stipulation, IT IS FURTHER ORDERED that the period of time from April 3, 2006 through and including May 15, 2006, shall be excluded from the period of time within which trial must commence under the Speedy Trial Act, 18 U.S.C §§ 3161(h)(8)(A) and (B)(iv).

Dated: April 13, 2006

\_\_\_\_\_/s/ Ronald M. Whyte  
RONALD M. WHYTE  
United States District Judge

1 Distribute to:

2 Angela Hansen  
3 Assistant Federal Public Defender  
160 West Santa Clara Street, Suite 575  
4 San Jose, CA 95113  
Counsel for Defendant

5 Susan Knight  
6 Assistant United States Attorney  
150 Almaden Blvd., Suite 900  
7 San Jose, CA 95113  
Counsel for the United States